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August 19, 2024

Hon. Marian W. Payson
United States Magistrate Judge
100 State Street
Rochester, New York 14614

SENT VIA E-FILING

Re: United States v. Timothy Jackson Jr.
Case No. 24-MJ-4013

Dear Judge Payson:

I am respectfully requesting a 45 day adjournment of our status conference set for August 22nd.

I have received an extensive amount of audio tapes, transcripts, pole camera excerpts, and other discovery from the government. I have met and continue to meet with my client and will need additional time to review this extensive amount of discovery. Although there are a number of transcripts, some recordings were not transcribed which will entail further work ascertaining the relevance of each audio recording. Mr. Jackson is detained and I would like to have sufficient time to continue to review the materials with my client as a part of our assessment of this case.

I have communicated with AUSA Marangola and I understand that he does not object to this request. I further consent to the exclusion of time associated with the adjournment for Speedy Trial purposes.

Thank you for your consideration.

Very truly yours,

/s/ Maurice J. Verrillo

Maurice J. Verrillo
pc: Robert Marangola, AUSA via e-filing
Mr. Timothy Jackson Jr. via regular mail